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Public Version

November 13, 2001

Via Electronic Mail

Gloria Blue
Executive Secretary
TPSC, Office of the U.S. Trade Representative
600 17th Street, N.W.
Washington, DC 20508

Re: Steel 201, Request To Exclude Products From
Section 203 Import Relief: Ultra-Wide-Width Tin-
Free Steel

Dear Ms. Blue:

This request is submitted on behalf of Corus Group, plc,
seeking the exclusion of ultra-wide-width tin free steel, with a
width over 38", from any relief that may be imposed in the
Section 201 investigation of Certain Steel.

Set forth below are the details sought in the notice dated
October 26, 2001, 66 Fed. Reg. 54,321.

- (a) The designation of the product under a recognized
standard or certification (e.g., ASTM, DIN), or the
commercial name for the product and the HTS number
under which the product enters the United States.

The commercial name of the product is ultra-wide tin free steel. The applicable HTS numbers include, but are not limited to the following: 7210110000, 7210120000, 7210500000, 7210706090. This tin free steel product is single- and double-reduced electrolytically chromium- or tin- coated steel, with a width over 38", regardless of temper, finish coating or other properties. Tin free steel falls under ASTM A 657/623.

- (b) A description of the product based on physical characteristics (e.g., chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the product from products for which exclusion is not sought.

As noted above, the product is an electrolytically chromium- or tin-coated steel. The distinguishing feature of the product for which exclusion is sought is that its width is over 38".

- (c) The basis for requesting an exclusion.

We are unaware of U.S. production of ultra-wide tin free steel in widths over 38". A separate submission will be filed today by [] which will further attest to the lack of domestic supply. []

] Exclusion

of ultra-wide tin free steel from any import restrictions imposed in Section 201 relief therefore will not harm U.S. producers. To the contrary, failing to exclude these products will harm U.S. tin mill producers by diminishing the competitiveness of their major customers in the U.S. can industry. U.S. can makers already are under significant competitive pressures from alternative forms of packaging, and a limitation on needed supplies of ultra-wide width tin free steel will only accelerate the general decline in demand for all tin mill products. (See, for example, the testimony before the International Trade Commission of Mr. Marc Seanor, Director of Steel Purchasing of Ball Corporation (Sept. 20, 2001 ITC Tr. at 1155-59), Mr. Edward Vesey, Senior Vice President of Crown Cork & Seal Company (Sept. 20, 2001 ITC Tr. at 1159-62), and Mr. Tom Scrimo, General Manager at United States Can Company (Nov. 6, 2001 ITC Tr. at 297-300)).

- (d) The names and locations of any producers, in the United States and foreign countries, of the product.

Foreign producers include [

] We

know of no U.S. producers.

- (e) Total U.S. consumption of the product, if any, by quantity and value for each year from 1996 to 2000, and projected annual consumption for each year from 2001 to 2005, with an explanation of the basis for the projection.

Based on knowledge of actual market consumption, we believe that total U.S. consumption, in short tons, of ultra-wide tin free steel is as follows:

1996	[100]
1997	[83.3]
1998	[92]
1999	[100]
2000	[108]

We believe that projected U.S. consumption for years 2001-2005 will be [] short tons per year. If there is a punitive tariff remedy or a restrictive quota, then this projection will be invalid, since without access to needed imports and without adequate domestic production, U.S. purchasers will be unable to use ultra-wide tin free steel.

- (f) Total U.S. production of the product for each year from 1996 to 2000, if any.

We are unaware of any domestic production of ultra-wide tin free steel in widths over 38".

- (g) The identity of any U.S.-produced substitute for the product, total U.S. production of the substitute for each year from 1996 to 2000, and the names of any U.S. producers of the substitute.

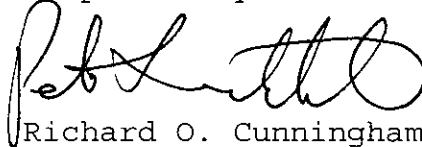
There is no U.S.-produced substitute for ultra-wide tin free steel. [

] Therefore, trade restrictions on ultra-wide tin free steel would not provide a benefit to U.S. steel producers, but would cause significant harm to U.S. can producers.

Please note that confidential treatment is requested for the company-specific business information and numeric data set forth above, containing confidential business information and projections of ultra-wide tin free steel, the public release of which could harm the competitive position of the manufacturers and purchasers of this product. (The numbers are indexed in the public version.)

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Peter Lichtenbaum". The signature is fluid and cursive, with the first name "Peter" being more prominent than the last name "Lichtenbaum".

Richard O. Cunningham
Peter Lichtenbaum